

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2016 JAN 14 AM 11:38

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONTBY 
DEPUTY CLERKUNITED STATES OF AMERICA,
Plaintiff,

v.

CEDRIK BOURGAULT-MORIN,
Defendant.

Docket No. 2:16-MJ-5

MOTION FOR DETENTION

NOW COMES the United States of America, by and through its attorney, Eric S. Miller, United States Attorney for the District of Vermont, and moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves a serious risk that defendant will flee, *see* 18 U.S.C. § 3142(f)(2)(A).

2. Reason For Detention. The defendant is a Canadian citizen with no known ties to the District of Vermont. At the time of his arrest, the defendant was in possession of a substantial quantity of a schedule IV controlled substance, worth approximately \$1.6 million. The defendant had pulled the approximately 90 kilograms of prescription drugs across the United States-Canadian border on a sled. The circumstances of his offense indicate he had the assistance of coconspirators on the Canadian side of the border, and he was anticipating assistance of coconspirators on the American side of the border. Given the value of the contraband, the indications of a drug trafficking organization with substantial assets, and the defendant's alien status, the government believes a preponderance of the evidence exists that the defendant will flee. Further, the government believes no combination of conditions will reasonably assure the appearance of the defendant for trial.

3. Time For Detention Hearing. The United States requests the court hold the detention hearing at the initial appearance, provided that the pretrial services officer has had sufficient time to complete his investigation.


Dated at Burlington, in the District of Vermont, this 14th day of January, 2016.

Respectfully submitted,

UNITED STATES OF AMERICA

ERIC S. MILLER
United States Attorney

By:



JONATHAN A. OPHARDT
Assistant United States Attorney
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CERTIFICATE OF SERVICE

I, Jonathan Ophardt, hereby certify that on the 14th day of January, 2016, I filed the Detention Motion with the Clerk of the Court. A copy of such filing will be hand delivered to the appointed defense attorney at the initial appearance.


Jonathan Ophardt
Assistant United States Attorney